

1 McCormick, Barstow, Sheppard,
2 Wayte & Carruth LLP
3 Jonathan W. Carlson
Nevada Bar No. 10536
jonathan.carlson@mccormickbarstow.com
4 Cheryl A. Grames
Nevada Bar No. 12752
cheryl.grames@mccormickbarstow.com
5 Chenelle L. Jackson
Nevada Bar No. 15750
chenelle.jackson@mccormickbarstow.com
6 8337 West Sunset Road, Suite 350
7 Las Vegas, Nevada 89113
Telephone: (702) 949-1100
8 Facsimile: (702) 949-1101
9 Attorneys for Defendants Liberty Mutual
Insurance Company. (aka LM General Insurance
10 Company; aka Safeco Insurance Company)

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

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14 EVELYN CONERLY, an individual,
15 Plaintiff,
16 v.
17 LIBERTY MUTUAL INSURANCE
COMPANY, (AKA LM GENERAL
18 INSURANCE COMPANY; AKA SAFECO
INSURANCE COMPANY); DOES I through
19 X, and ROE CORPORATION I through X,
inclusive,
20 Defendants.
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Case No. 2:23-cv-00515-GMN-EJY

**STIPULATION TO EXTEND DEADLINE
FOR LIBERTY MUTUAL TO FILE ITS
REPLY IN SUPPORT OF ITS MOTION
TO DISMISS**

(First Request)

22 Plaintiff, EVELYN CONERLY (“Plaintiff”) and Defendant, LIBERTY MUTUAL
23 INSURANCE COMPANY (“Liberty Mutual”) (collectively, “Parties”), by and through their
24 respective counsel, hereby stipulate to extend the deadline for Liberty Mutual to File its Reply in
25 Support of its Motion to Dismiss, filed on April 14, 2023 (ECF No. 6). This is the first stipulation
26 for extension of time to file a reply in support of this pending motion.

27 On June 8, 2023, Plaintiff filed her Response to Liberty Mutual’s Motion to Dismiss. (ECF
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Case No. 2:23-cv-00515-GMN-EJY

STIPULATION TO EXTEND DEADLINE FOR LIBERTY MUTUAL TO FILE ITS REPLY IN SUPPORT OF ITS
MOTION TO DISMISS

1 No. 18). Liberty Mutual's Reply in Support of its Motion to Dismiss is currently due on June 15,
2 2023. The Parties agree to extend the deadline for Liberty Mutual to file its Reply by one week, to
3 **June 22, 2023.** Liberty Mutual requests this extension because additional time is needed to respond
4 to Plaintiff's alternative Motion for Leave to File Amended Complaint that was submitted
5 simultaneously with Plaintiff's Opposition to Defendant's Motion to Dismiss. This request is made
6 in good faith, and not for the purpose of undue delay.

7 Dated: June 13_, 2023

THEONELAWYER.COM

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By: _____ /s/ Laura Payne
Laura Payne
Nevada Bar No. 4718
2831 St. Rose Parkway, Ste. 200
Henderson, NV 89052
Attorney for Plaintiff Evenlyn Conerly

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Dated: June 13, 2023

McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

By: _____ /s/ Chenelle L. Jackson

Jonathan W. Carlson
Nevada Bar No. 10536
Cheryl A. Grames
Nevada Bar No. 12752
Chenelle L. Jackson
Nevada Bar No. 15750

Attorneys for Defendants Liberty Mutual Insurance
Company. (aka LM General Insurance Company; aka
Safeco Insurance Company)

IT IS SO ORDERED.

Dated: June 15, 2023



CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June, 2023, a true and correct copy of **STIPULATION TO EXTEND DEADLINE FOR LIBERTY MUTUAL TO FILE ITS REPLY IN SUPPORT OF ITS MOTION TO DISMISS** was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

By /s/ Susan Kingsbury

an Employee of
McCORMICK, BARSTOW, SHEPPARD,
WAYTE & CARRUTH LLP

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